



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
1595 WYNKOOP STREET
DENVER, COLORADO 80202
<http://www.epa.gov/region8>

JUN 15 2010

Ref: 8EPR-N

Mr. Steven J. Kozel, District Ranger
P.O. Box 680
101 South 21st Street
Sundance, Wyoming 82729

Re: CEQ # 20100172, EPA Comments on
Rattlesnake Forest Management Project
FEIS & ROD

Dear Mr. Kozel:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Black Hills National Forest's Rattlesnake Forest Management Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. 4231 and Section 309 of the Clean Air Act.

We acknowledge the ROD conclusion to limit the prescribed burn activity from the original preferred alternative B of 6,142 acres to alternative B modified of 3,215 acres. While this is a significant reduction in prescribed burn acreage, the remaining 3,215 acres may still result in adverse air quality impacts. The FEIS indicates that responses to EPA's DEIS comments regarding air quality impacts are found on FEIS pages 27-28, 34, 96-98, and 100. While some of our concerns were addressed, like ensuring notification of prescribed fire activity with the State of Wyoming and conditions to begin a prescribed fire, other pertinent points were not addressed. For example, we did not see that particulate emissions from proposed prescribed burning activities were estimated (i.e., broadcast burning and slash pile burning), nor were other EPA recommendations to improve the EIS air quality impact analysis and disclosure fully addressed.

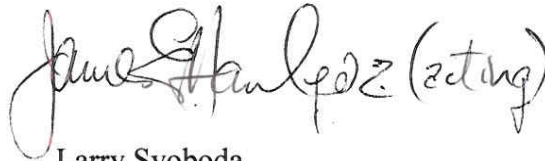
While we believe it is likely that meteorological conditions in the Rattlesnake Forest Management project area are likely to provide for dispersal of smoke, we want to draw your attention to the Forest Service Region 1 Air Quality Guidance for air quality impact analysis and disclosure in NEPA documents, <http://www.fs.fed.us/r1/gallatin/resources/air/guidance/index> . We believe the air quality impact analysis and disclosure in the Rattlesnake Forest Management Project EIS regarding use of prescribed fire on Federal lands could be improved with adherence to this Forest Service Region 1 Air Quality Guidance, which includes estimating particulate



emissions. We are pleased that smoke conditions during burning operations will be monitored in accordance with the Clean Air Act, and that fire managers will model smoke production and dispersal prior to prescribed burns to ensure requirements are met (ROD, Attachment 1).

We appreciate the opportunity to review and comment during the NEPA process. If we may provide further explanation of our comments, please contact me at 303-312-6004, or Stephen Potts, of our EPA Region 8 Montana Office, at 406-457-5022. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Svoboda (acting)".

Larry Svoboda
Director, NEPA Program
Office of Ecosystem Protection and Remediation